

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
WINCHESTER DIVISION

DEBRA BROWN, JEROME BELL,)
CHARLES BROOKS, MICHAEL McGUINN,)
AND JASON SWEARINGTON,)

Plaintiffs.)

vs.)

No. 4:05-CV-67)

COFFEE COUNTY, TENNESSEE; STEVE)
GRAVES, Individually and in his)
official capacity; PAMELA FREEMAN,)
Individually; OFFICER TREY,)
Individually; BRITNEY HODGES,)
Individually; TERESA HULAN,)
Individually; SGT. GENTRY,)
Individually; KEITH SELLER,)
Individually, LT. CHARLES BEATTY,)
Individually; KAYRON BOWEN,)
Individually; JONATHAN YOTT,)
Individually; WADE FERRELL,)
Individually; and JOHN DOE 1-5,)

Defendants.)

Deposition of:

GREGORY J. MORGAN

Taken on Behalf of the Defendants

April 4, 2007

Bain, Cleeton & Evans
An Association of Court Reporters
212 Third Avenue North • Suite 201
Nashville, Tennessee 37201
Phone: (615)255-6425

Reported By: LaVonne Cleeton, RMR

1 you're brought to the jail?

2 A. When they're booking you in, you get a
3 copy of the rules and regulations. Well, it's just
4 a piece of paper saying, you know, that you've got a
5 copy and you sign it and they give you the book.

6 Q. Did you read through it?

7 A. Yes, sir.

8 Q. What were you told about how -- I mean,
9 what medical care was available for you and how you
10 go about getting it?

11 A. You were told to fill out a written
12 medical request or ask a nurse or a guard if you see
13 one.

14 Q. Did you ever have problems getting the
15 form that you needed to fill out?

16 A. Every time.

17 Q. Tell me about that.

18 A. Well, see, I never really asked for one
19 until I started getting sick, telling them I needed
20 to see the nurse. And I asked for one and they
21 said, "Well, we don't have any," you know, or, "The
22 nurse is not in."

23 Q. Who were the nurses back in '03?

24 A. Jonathan Yott was the nurse that -- the
25 one I was trying to get to.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. I never saw him. He just -- they
2 started sending meds to me.

3 Q. Okay. And did you get the Keflex and
4 the ibuprofen?

5 A. Yes, sir.

6 Q. Did that help?

7 A. A little bit. Not very much.

8 Q. What did you do next related to this
9 tooth? I mean, did you submit any more written
10 requests for treatment?

11 A. Actually, for about two -- this lasted
12 two weeks, what he gave me here, the Keflex and
13 ibuprofen, and after that I started filling out
14 requests again and asking to see the nurse and was
15 getting nowhere.

16 Q. Did you have other written requests
17 that you submitted?

18 A. I turned in, I think, five.

19 Q. Five in addition to the two that I've
20 showed you?

21 A. Yes. The five were after these two.

22 MR. BEEMER: Okay. Let's make this one
23 Exhibit 4.

24 (Whereupon, the previously mentioned
25 document was marked Exhibit No. 4.)

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 If it's not on September 8, 2003, do
2 you know how far before it was? Can you give me a
3 date?

4 A. I'd say September the 4th.

5 Q. So was your tooth bothering you from
6 the time that you did the second course of
7 antibiotics in August until September 4?

8 A. Once the antibiotics and stuff were
9 gone it was still bothering me.

10 Q. Okay. So what happened on September 4?

11 A. It just started hurting real bad and
12 that's when I began to request to see the nurse and,
13 you know, trying to get help. And I went through
14 the whole entire week, all the way up until the
15 date.

16 Q. Did you continue to work during that
17 time?

18 A. Uh-huh.

19 Q. Make sure you say yes.

20 A. Yes. I'm sorry.

21 Q. Did you ever see Jonathan Yott during
22 that time?

23 A. No, sir.

24 Q. What happened on September 8th, 2003?
25 Did it get worse that day?

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. It was very bad that day. I came in
2 from work and asked to see the nurse. Was told he
3 wasn't here. And the guards came back down and I
4 asked for a medical request form. They said they
5 didn't have any. Told me to leave them alone. So
6 then I laid down.

7 Q. What officers told you?

8 A. One of them was Nick and the other guy
9 I do not remember. He's no longer employed here.

10 Q. Do you know Nick's last name?

11 A. Crosier, I believe.

12 Q. I think you said you submitted five
13 more written requests to see a nurse about your
14 tooth?

15 A. Yes, sir.

16 Q. Do you know who you gave those written
17 requests to?

18 A. My cellmate next to me gave them to the
19 guard that would come down there.

20 Q. Do you know who the guard was?

21 A. I have no idea.

22 Q. Why did your cellmate give it to the
23 guard?

24 A. Because I couldn't get out of bed.

25 Q. As of what day?

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. September the 8th.

2 Q. Okay. But I'm -- what is the day that
3 you started submitting written medical requests for
4 the tooth?

5 A. Let's say September the 7th.

6 Q. September the 7th is -- all right. We
7 know that you submitted a written request on
8 August 7th.

9 A. Right. I'm going back to September the
10 7th because I turned them in a bunch so they would
11 get the hint that I was in serious pain.

12 Q. Okay. So September 7, 2003 you're in
13 so much pain you can't get out of your bunk?

14 A. Right.

15 Q. And you had to have your cellmate give
16 your written medical request to the officer?

17 A. The guards.

18 Q. And you don't know the name of the
19 officer?

20 A. No.

21 Q. Who was your cellmate?

22 A. His name was Rick Smith.

23 Q. Was this the morning of September 7,
24 2003?

25 A. Yes.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 Q. Did you leave the jail that day to
2 work?

3 A. Yes.

4 Q. Why did you leave the jail if you were
5 so sick?

6 A. So I could go to the job I was at and
7 lay there and get some Aleve or medicine or some
8 sort of something to help me.

9 Q. And get your two-for-one credit?

10 A. Well, that didn't really concern me at
11 all, to be honest with you.

12 Q. Well, did you ever consider on
13 September 7th saying, "I'm going to stay in today so
14 that I can see the nurse while the nurse is here"?

15 A. It wouldn't have done me any good
16 because I had asked to see him for a week straight
17 and they kept ignoring me.

18 Q. My question, though, is did you ever
19 consider doing that?

20 A. No. Absolutely not. I thought I might
21 be able to get more help where I was going.

22 Q. Did you get any medicine where you --

23 A. Yes, sir.

24 Q. So that's September 7th?

25 A. Right.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 Q. What did you get at the Senior Center
2 that day?

3 A. Aleve and ibuprofen. My mother brought
4 it to me.

5 Q. At that point did you have any -- your
6 mother came to Tullahoma and brought it to you?

7 A. Yes, sir. She works in Tullahoma. She
8 was right there.

9 Q. At that point did you say -- I mean,
10 obviously Jonathan Yott can't do a root canal, can
11 he?

12 A. Right. Right.

13 Q. And your own dentist doesn't do a root
14 canal?

15 A. Right.

16 Q. Did you have any discussions with your
17 mother on September 7th about, "I need to get an
18 appointment to see the dentist"?

19 A. Yes. And she was going to call and
20 make me one.

21 Q. Do you know if she did?

22 A. No. She had to call Pam and Pam
23 instructed her that you had to have a furlough and
24 it would take about a week and she didn't explain to
25 her that I didn't have that long.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 Q. Your mother's making this call. Why
2 didn't you make the call?

3 A. I can't call up front to Pam from the
4 annex.

5 Q. But I'm saying when you're at the
6 Senior Center when your mom brought you some
7 medicine --

8 A. Uh-huh.

9 Q. -- did you ever get out the Yellow
10 Pages and find a dentist and call?

11 A. No, sir. I was very, very sick. I
12 just -- you know, I needed some help and I knew I
13 could get it from her.

14 Q. Did you do any work on September 7th?

15 A. No, sir.

16 Q. Before the morning of September 7th --
17 well, you've already told me that your cellmate gave
18 the note to the corrections officer to pick up on
19 September 7th.

20 A. Uh-huh.

21 Q. What was the result of -- first of all,
22 what time was that that the note was given to the --

23 A. Before we went to work. Probably 6:00,
24 6:30 maybe. It was probably 6:00.

25 Q. Okay. So you give the note at 6:00 and

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 you leave the jail at 6:30 a.m.?

2 A. Right.

3 Q. During that half hour had anyone told
4 you that you're not going to be able to see the
5 nurse that day?

6 A. No. They said, "He's not in yet. I'll
7 give it to him when he gets here."

8 Q. Okay. So before that time -- that's
9 the first time since August 7th you submitted a
10 written request?

11 A. Uh-huh. Yes, sir.

12 Q. So at that point, when you leave for
13 work on September 7, 2003, you've not been denied
14 the chance to see the nurse at that point, correct?

15 A. No, sir. Technically, no, because when
16 I get back he would have saw me when I got back.

17 Q. And what discussions did you have when
18 you got back to the jail on September 7th about
19 seeing the nurse?

20 A. I asked if he was in.

21 Q. Who did you ask?

22 A. I was walking through there. I went up
23 to the window -- I'm sorry. I went up to the
24 booking window right next to the annex and asked if
25 he was in. They said he was gone for the day.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 Q. Did you ask for Jonathan by name or
2 just "the nurse"?

3 A. I asked for Jonathan Yott, the nurse.

4 Q. And who did you talk with at the
5 booking window?

6 A. Her name was Brandy Rogers, I believe.
7 She was a corrections officer here at the time.

8 Q. Did you explain to Miss Rogers what the
9 problem was?

10 A. Uh-huh. Yes, sir.

11 Q. What did you tell her?

12 A. I told her that I had serious pain. I
13 had an abscessed tooth. I needed to see him. She
14 said, "Well, he's not in." Turned around and walked
15 off. Pretty much ignored me like everybody else
16 here does.

17 Q. Did you do anything else on
18 September 7th? Did you talk with anyone else on
19 September 7th --

20 A. No, sir.

21 Q. -- other than Miss Rogers?

22 A. No, sir.

23 Q. Did you submit any more written
24 requests on September 7th?

25 A. No, sir. I did ask -- on September the

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 7th I had my cellie go up there and ask if the nurse
2 would -- or if a guard would come down -- excuse me.
3 If a guard would come down there and see me. It was
4 an emergency.

5 Q. And that was your cellmate?

6 A. Uh-huh. Yes.

7 Q. And who did your cellmate speak with?

8 A. I don't remember. One of the guards.

9 I really don't remember.

10 Q. What did the officer say?

11 A. They said, "Okay."

12 Q. Okay. Anything else that happened on
13 September 7, 2003 related to your tooth?

14 A. No, sir.

15 Q. September 8, 2003.

16 A. Uh-huh.

17 Q. Tell me what happened that day.

18 A. I asked again in the morning to see the
19 nurse. You know, I didn't get anywhere. I got up
20 and went to work.

21 Q. Did you submit a written request?

22 A. Uh-huh.

23 Q. Make sure you say yes.

24 A. Yes.

25 Q. Did you give it to the guard or did

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 your cellmate?

2 A. No, sir. My cellmate.

3 Q. And why did your cellmate do it?

4 A. Because I -- I laid there in my bunk
5 until they called for me to leave and I had to have
6 help getting on the van.

7 Q. Okay. So these written requests, was
8 it your writing or your cellmate's writing?

9 A. It was his writing, but I signed it.

10 Q. And was that one submitted at 6:00 like
11 the one the day before?

12 A. Same time, yes.

13 Q. And what was the response?

14 A. I didn't hear anything.

15 Q. And you left the jail at 6:30?

16 A. Yes.

17 Q. You said you had to be helped onto the
18 van?

19 A. Uh-huh. Yes.

20 Q. Who helped you on the van?

21 A. One guy that was riding with us. He
22 actually worked somewhere else, but he just kind of
23 helped me up the steps and I laid down in the back
24 seat.

25 Q. Is this an inmate or an officer?

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. It was an inmate.
2 Q. But you don't know his name?
3 A. No, sir.
4 Q. What did you do that day at the Senior
5 Center?
6 A. Nothing. I laid down on the couch.
7 Took Aleve and ibuprofen.
8 Q. And where did you get the Aleve and
9 ibuprofen?
10 A. Same place. My mother.
11 Q. So your mother came to visit you again?
12 A. No. She actually just came once. I
13 had enough for two days.
14 Q. Okay. So did you see her or talk to
15 her that day?
16 A. Yes.
17 Q. I really asked two questions there. So
18 she did not come to see you on the 8th?
19 A. Oh. No. I'm sorry. No.
20 Q. Did you talk to her on the phone?
21 A. Yes, sir. I called her.
22 Q. And what did you tell her?
23 A. I asked her if she had gotten anywhere
24 with the dentist appointment or if she had talked to
25 Pam. She then explained about the furlough and, you

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 know, it would take a week. And she told Pam that I
2 couldn't wait a week.

3 Q. Had she made an appointment at that
4 point or she just --

5 A. She couldn't. She could not make an
6 appointment. I had to get a furlough and that would
7 take a week. I have to get a written request for a
8 furlough and get it approved and that would take a
9 week for a dentist appointment.

10 Q. So did you just lie on the couch that
11 day at the Senior Center?

12 A. Yes, sir.

13 Q. And got back to the jail at the usual
14 time?

15 A. Yes, sir.

16 Q. And did you request to see the nurse
17 then?

18 A. Yes, sir. I didn't fill out a medical
19 request. I just asked. I asked if he was in. They
20 told me he was gone for the day.

21 Q. And who did you speak with this time?

22 A. I don't remember. There's different
23 guards every day that search the cell.

24 Q. But the same thing? He's gone for the
25 day?

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. Yes.

2 Q. At that point, on the 8th, did you have
3 any swelling in the face?

4 A. Yes, sir. Yes, sir.

5 Q. When did the swelling start?

6 A. It started on the night of the 7th.
7 When I woke up on the 8th, it was swollen. It
8 started out right here. (Indicating.)

9 Q. You're pointing to your right jaw?

10 A. My right jaw.

11 Q. Anything else that you did on the 8th?

12 A. No, sir. I went in, laid down, went
13 straight to sleep.

14 Q. Okay. The same question --

15 A. Well, I laid down. I didn't go to
16 sleep.

17 Q. The same question I asked you on the
18 7th. Did you consider staying -- I mean, you had
19 been told on the 7th in the morning that the nurse
20 is not in, and when you got back to the jail he's
21 gone for the day.

22 A. Well, it was obvious they weren't going
23 to help me because I'd been trying for a week.

24 Q. Let me finish my question.

25 A. I'm sorry.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 Q. Did it cross your mind on the 8th that
2 I'm going to stay in the jail today so that I can
3 see the nurse while he's here?

4 A. No.

5 Q. Why is that?

6 A. Because I knew I wasn't going to get
7 any help. It was obvious they weren't going to help
8 me any longer. I guess they probably thought I was
9 just lying or something.

10 Q. Well, Jonathan at that point had given
11 you two courses of antibiotics, had he not? One in
12 April and one in August?

13 A. Right. Right.

14 Q. Why did you think he wasn't going to
15 help you this time?

16 A. I don't know, to be honest with you. I
17 mean, it had been a whole entire week and I had sent
18 request after request and asked the guards, you
19 know, to help me and they didn't.

20 Q. Jonathan's not -- I mean, all Jonathan
21 is doing at this point is working his normal hours?

22 A. Right. Right.

23 Q. I mean, it's not Jonathan --

24 MR. BAUM: Objection. I don't think
25 he's going to know what Jonathan's doing.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 Q. (BY MR. BEEMER) Meaning you've not
2 seen Jonathan and Jonathan says, "I'm not going to
3 see you." It is just that when you leave in the
4 morning, Jonathan is not there; when you get back at
5 the end of the day, he's gone for the day?

6 A. Right.

7 Q. So, I mean, what makes you think that
8 Jonathan, if you saw him during the day --

9 A. Because, for all I know, when I'm in
10 the annex down here, he could still be here and
11 they're just telling me whatever. For all I know,
12 those medical requests never got to him. The guards
13 here, they don't care. You know, they don't care.

14 Q. All right. I mean, did you have an
15 indication that Jonathan didn't care?

16 A. In a way, yes, I did. I'm sure he got
17 some of the medical requests and didn't respond.

18 Q. How can he respond if you're not there?

19 A. Because they'll let Pam know to let me
20 know when I come in from work.

21 Q. Okay.

22 A. And they'll send the antibiotics down
23 if I need them.

24 Q. Do you think your -- if you need
25 medical care, do you think you're responsible for

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 staying in the jail if you need to see the nurse
2 during his scheduled hours?

3 A. I'm sorry. Say that one more time.

4 Q. If you need medical care like you've
5 been telling me for awhile --

6 A. Right.

7 Q. -- does any responsibility fall on you
8 to stay in the jail so that you can be seen by the
9 nurse during his scheduled working hours?

10 A. Absolutely. If he makes me an
11 appointment. They'll call and say that you have --
12 come see the nurse. And I never heard anything.

13 Q. So -- I'm not sure you answered my
14 question.

15 A. Is it my responsibility to --

16 Q. To actually be here to be seen by the
17 nurse.

18 A. Yes. I believe it is.

19 Q. So why didn't you do that?

20 A. He hadn't been helping me. I could get
21 help out there, you know. I didn't know what else
22 to do, you know. They weren't going to help me. I
23 had to do something.

24 Q. Okay. What happened on August 9th?

25 A. On August 9th I woke up -- well, I

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 stayed up all night spitting out poison and blood.

2 MR. BAUM: August or September?

3 THE WITNESS: September. September the
4 9th. I went and asked the same thing, see the
5 nurse. Didn't get him. He wasn't there. So I went
6 on to work.

7 My mother came and saw me again. Gave
8 me some more Aleve and antibiotics. She said, "I'm
9 going to go talk to Pam." She called and they told
10 her Pam was not in and she tried to call back.

11 Q. (BY MR. BEEMER) So did you do the same
12 thing that morning? You submitted a written request
13 at 6:00?

14 A. No. I didn't even turn one in that
15 morning. I asked to see the nurse and they said,
16 "Well, he's not here yet."

17 Q. Who did you talk to?

18 A. I have no idea.

19 Q. And then leave the jail at 6:30?

20 A. Yes. Same routine.

21 Q. And then what time did your mother come
22 see you that day?

23 A. Probably 9:00 in the morning maybe.
24 Maybe 8:30.

25 Q. And what did she bring you?

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. Aleve and ibuprofen.

2 Q. And what discussions did you have at
3 that point?

4 A. With her?

5 Q. Yes.

6 A. I didn't do a whole lot of talking.
7 She was severely upset and didn't know what else to
8 do. So I told her when I returned to the jail that
9 I would go up there physically and show them what
10 was wrong with me and try to get some help.

11 When I came back, they wouldn't let me
12 through there. (Indicating.) Up in Booking. I'm
13 sorry. I keep pointing.

14 Q. You couldn't go to Booking?

15 A. No. They said, "We're busy. Come
16 back."

17 Q. Who told you that?

18 A. I think her name was Ann. I'm sorry.
19 I don't remember her last name. She was a sergeant.

20 Q. She's the one that told you, "We're
21 busy, come back"?

22 A. Yes. And, actually, before you get
23 searched you're not even supposed to go up there to
24 the booking area.

25 Q. All right. Any more discussions with

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 any officers the evening of August 9th related to
2 your tooth?

3 A. No, sir. None at all.

4 Q. What happened on September 10th?

5 A. September the 10th I -- the telephones
6 do not come on in the annex until 6:00, so as soon
7 as the phone come on -- I was on the corner bunk. I
8 crawled to the phone and called my mother and told
9 her to come up here. I could barely talk. I
10 couldn't breathe. My throat was swollen. She came
11 up here and talked to Pam -- Lieutenant Freeman, and
12 then three guards came to the annex and got me.

13 Q. All right. First of all, I think I
14 forgot something. Did your mom talk with Pam
15 Freeman again on the 9th?

16 A. No, sir. She came up here.

17 Q. She came up here on the 9th and talked
18 to Pam?

19 A. No, no, no. On the 10th she came up
20 here.

21 Q. So how many discussions at that point
22 had your mother had with Pam Freeman?

23 A. Just one, about the furlough.

24 Q. And that was on the 7th?

25 A. The furlough was on -- I don't

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 remember. Yeah. No, it was on the 8th. It was on
2 the 8th.

3 Q. Getting back to -- so you called your
4 mother at 6:00 and asked her to come see you at the
5 jail?

6 A. Uh-huh. Yes, sir.

7 Q. So that day you did not go out on work
8 release?

9 A. No, sir.

10 Q. And what happened that day?

11 A. They came -- I'm sorry. They came and
12 got me and took me to the dentist over at Mike
13 Shelton's office. They had my mother follow -- Nick
14 Crosier is the one who took me to the dentist, Mike
15 Shelton.

16 When I got there the dental assistant,
17 she x-rayed me and informed her boss, Mr. Shelton,
18 that I need to get to the ER. I had about an hour
19 to live.

20 Q. Who told you that, that you had an hour
21 to live?

22 A. The dental assistant in Mike Shelton's
23 office.

24 Q. Because you didn't see the dentist till
25 about 1:00 that day?

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. Right. They couldn't get me to the
2 dentist until 1:00.

3 Q. Who couldn't?

4 A. I couldn't get in to see the dentist
5 until 1:00.

6 Q. Was that because of the dentist's
7 schedule?

8 A. Yes. Yes.

9 Q. Did you see the nurse that morning?

10 A. No.

11 Q. Why did the dental assistant tell you
12 you had an hour to live?

13 MR. BAUM: Objection. Go ahead if you
14 know.

15 Q. (BY MR. BEEMER) Did I misstate your
16 earlier testimony? The dental assistant told you
17 you had an hour to live?

18 A. Uh-huh. She was looking at Nick
19 Crosier, the guard that took me, and she said, "This
20 guy is not going to make it. He has about an hour.
21 He's going fast."

22 Q. I guess my question is, do you know
23 what the basis of her statement is that you had an
24 hour to live?

25 A. I guess because my throat was swollen

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 and she's -- that's what she does. I mean, I'm sure
2 she knew better than I did. She tried to take an
3 x-ray of my -- and couldn't get it because I
4 couldn't open my mouth wide enough.

5 Q. All right. So you went to
6 Dr. Shelton's office?

7 A. Dr. Shelton.

8 Q. And then what happened from there?

9 A. He referred me to Dr. Thurman in
10 Tullahoma. I went to Dr. Thurman. He examined me.
11 Made an appointment -- or had me in surgery at 6:00
12 in Harton Hospital.

13 Q. How did you get from Dr. Shelton's
14 office to Dr. Thurman's office?

15 A. My mother took me. They released --
16 Nick Crosier borrowed my mother's cell phone in
17 Dr. Thurman's office in Tullahoma to talk to Pam,
18 and they released me ROR, and then she took me to
19 the hospital.

20 Q. Okay. You had two teeth that you had
21 extracted?

22 A. Uh-huh.

23 Q. Right?

24 A. (Witness moves head up and down.)

25 Q. And I guess because of --

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 and when it got to the emergency status they have
2 duties that they need to do, and they did not do
3 them.

4 Q. Okay. What in particular did Jonathan
5 Yott not do, in your opinion?

6 A. He didn't answer me, my requests. He
7 didn't see me.

8 Q. If Jonathan Yott were to say, "I can't
9 see you if you're not in the jail when you're out on
10 work release," how do you respond to that?

11 A. I can say, "Well, I've been asking to
12 see you for a week and I've been told that you're
13 not in or that you're busy." And if he's going to
14 see me, then like I told you before, they'll leave a
15 note or they'll call me.

16 Q. Is Jonathan Yott responsible for you
17 leaving the jail on work release those days?

18 A. No.

19 Q. Is there ever a time you talked with
20 Steve Graves about your dental condition?

21 A. No, sir.

22 Q. Why have you sued him?

23 A. I was under the impression that it was
24 all together. I had to.

25 Q. But, I mean --

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425